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May 5, 2023

VIA ECF

Honorable Kenneth M. Karas
United States District Judge
Southern District of New York
300 Quarropas Street, Courtroom 521
White Plains, New York 10601

Re: Finn v. Empress Ambulance Services, Inc. d/b/a Empress EMS, Case No. 7:22-cv-08101-KMK (the "Finn Action")

Dear Judge Karas:

As you know, we represent Empress Ambulance Service, LLC ("Empress") in the above-captioned *Finn* action. Empress writes jointly with Plaintiff John Finn pursuant to the Court's November 14, 2022 Order [ECF No. 17] requiring the parties to the *Finn* Action to submit joint status reports to the public docket providing updates on the progress of settlement negotiations every 14 days. The thirteenth status report is due today, May 5, 2023.

Since the parties' previous status report, they have continued to meet and confer to finalize settlement negotiations. As previously noted, the parties also have finalized a plan to avoid jurisdictional objections and have agreed to the key points of the settlement agreement. The parties expect to finalize the settlement within the next two weeks and will report to the Court with an update in the next status report due on May 19. Additionally, the parties are continuing to work with the settlement administrator and notice expert to draft the long and short form notice, claim form, settlement website content, and telephonic procedures.

It will not be long until a motion for preliminary approval is filed. Therefore, we respectfully request that the Court continue to stay the later-filed actions during this process. The parties will continue to conclude work on the settlement and preliminary approval motion during the next two weeks and, in accordance with the Court's November 14, 2022 Order, will provide another status update on May 19, 2023.

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Respectfully submitted,



Caside D. Collignon

cc: All counsel of record (via ECF)